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DATE FILED: 2/14/2008

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AMERICAN INTERNATIONAL
GROUP, INC.,

Plaintiff,

-v-

TIMOTHY KANIA,

Defendant.

-----X

Case No. 07 Civ. 10689 (DAB)

STIPULATION AND ORDER OF
SETTLEMENT AND DISMISSAL

WHEREAS, Plaintiff American International Group, Inc. ("AIG") commenced the above-captioned action against Defendant Timothy Kania ("Kania") (the "Action"); and

WHEREAS, AIG and Kania have reached a settlement agreement, dated as of January 28, 2008, that has been fully executed, providing for a full and final settlement of the Action on the terms and conditions set forth therein, without any admission of liability or wrongdoing on the part of or on behalf of any of the Parties;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel, on behalf of the Parties hereto, as follows:

1. Kania will not, at any time, possess in tangible form, use or disclose, on Kania's own behalf, or on behalf of any third party, any confidential, proprietary or trade secret information belonging to AIG or any of its subsidiaries or affiliates ("AIG Confidential Information"). As used in this Stipulation, the term "AIG Confidential Information" shall not include any information that is or was: (i) already known to Kania prior to his affiliation with AIG; (ii) publicly available or that may become available in the public domain through no fault

or wrongful act of Kania; (iii) approved for public release by express written authorization of AIG; or (iv) sent to Kania by AIG following his resignation from AIG.

2. Until December 31, 2008, Kania will not solicit any employee of AIG or its subsidiaries or affiliates to leave his or her employment with AIG or its subsidiaries or affiliates for a position with or to render services to any other person or entity.

3. This Stipulation is effective immediately, without the need for any bond to be posted.

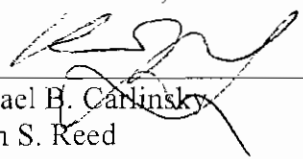
4. The action shall be and is hereby dismissed with prejudice, each party to bear its own costs and attorneys' fees.

5. This Court shall retain jurisdiction over the parties for the purpose of any proceeding to enforce this Stipulation.

DAB
2/14/08

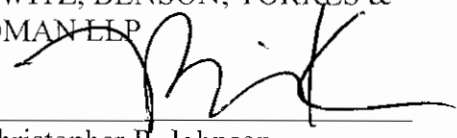
Dated: New York, New York
January 31, 2008

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SO ORDERED:


U.S.D.J. 2/14/08